

1. all expert discovery shall be completed by February 28, 2025;
  - a. the parties may jointly determine intermediary expert deadlines without consent of the Court;
2. the parties shall submit a joint status letter on March 3, 2025;
3. the case management conference will occur on March 6, 2025.

The amended case management plan will issue separately. SO ORDERED.

Via ECF

**MEMO ENDORSED**

Honorable Dale E. Ho, U.S.D.J.  
Thurgood Marshall Courthouse  
40 Foley Square, Courtroom 905  
New York, NY 10007



Dale E. Ho  
United States District Judge  
Dated: December 17, 2024  
New York, New York

RE: *Christopher Rodriguez v. Equinox Holdings, Inc., et al.*, Case No. 1:24-cv-01238

Dear Judge Ho,

Plaintiff writes jointly with Defendants to submit a proposed amended Case Management Plan at this Court's request, in light of the simultaneous settlement negotiations between the Parties. *See ex. A.* The Parties propose the following alternative dates for the completion of Expert Discovery, Joint Status Letter, and Case Management Conference following the Close of Discovery:

	Current Deadline	Proposed Deadline
Completion of fact discovery	January 17, 2025	
Parties' expert disclosures	January 17, 2025	
Completion of Expert Discovery	January 31, 2025	February 28, 2025
Joint Status Letter	February 12, 2025	March 12, 2025
Case Management Conference	February 20, 2025	March 20, 2025

We thank Your Honor for the Court's time and attention to this matter.

Respectfully submitted,



Olivia Davis

cc: All counsel of record